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24
 25 **UNITED STATES DISTRICT COURT**
 26
 27 **NORTHERN DISTRICT OF CALIFORNIA**
 28
 29 **SAN FRANCISCO DIVISION**

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 31 IN RE: UBER TECHNOLOGIES, INC.,
 32 PASSENGER SEXUAL ASSAULT
 33 LITIGATION

34
 35 This Document Relates to:

36 PLAINTIFF B.F.
 37 Case No. 3:25-cv-04466

38 PLAINTIFF H.S.01
 39 Case No. 3:25-cv-01999

40 Case No. 3:23-md-03084-CRB (LJC)

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 42 **DEFENDANTS' ADMINISTRATIVE**
 43 **MOTION TO SEAL PERSONAL**
 44 **IDENTIFYING INFORMATION**
 45 **CONTAINED IN DEFENDANTS'**
 46 **RESPONSE IN OPPOSITION TO MOTIONS**
 47 **TO WITHDRAW AS COUNSEL**

48
 49 Judge: Hon. Charles R. Breyer
 50 Courtroom: 6 – 17th Floor

1 **DEFENDANTS' STATEMENT IN SUPPORT OF SEALING CONFIDENTIAL MATERIALS**

2 Under Local Rules 7-11 and 79-5, Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-
 3 CA, LLC (“Uber” or “Defendants”) hereby move this Court for an order to seal the personal identifying
 4 information (“PII”) contained in its Response to Chaffin Luhana’s Motions to Withdraw as Counsel (the
 5 “Response”). The Response contains PII from materials produced by Plaintiffs. The Response is attached
 6 as Exhibit A, filed concurrently to this Administrative Motion.

7 A party seeking to seal a judicial record bears the burden of establishing that “compelling reasons”
 8 support that request. *Kamakana v. City and Cnty. of Honolulu*, 447 F.3d 1172, 1178–79 (9th Cir.2006).
 9 Specifically, that party must “articulate[] compelling reasons supported by specific factual findings ...
 10 that outweigh the general history of access and the public policies favoring disclosure [of court records],
 11 such as the public interest in understanding the judicial process.” *Kamakana*, 447 F.3d at 1178–79
 12 (quoting *Foltz v. State Farm Mut. Auto. Ins. Co.*, 331 F.3d 1122, 1135 (9th Cir. 2003)). “In turn, the
 13 [C]ourt must ‘conscientiously balance[] the competing interests’ of the public and the party who seeks to
 14 keep certain judicial records secret.” *Id.* (quoting *Foltz*, 331 F.3d at 1135).

15 Assessment of the public and private interests implicated here warrant sealing this information.
 16 Local Rule 79-5(c)(1)(i). Uber in particular seeks to seal the names of Plaintiffs, drivers, and other non-
 17 parties contained in the Response, as well as home and other addresses,¹ contact information such as phone
 18 numbers and email addresses, and financial information. Courts have found that such information “is
 19 sealable under the compelling reasons standard.” *See, e.g., Kumandan v. Google LLC*, No. 19-CV-04286-
 20 BLF, 2022 WL 17971633, at *1–2 (N.D. Cal. Nov. 17, 2022). That is because such information is “not
 21 relevant to any of the issues in this litigation, nor would the public have any real interest in its disclosure.”
 22 *O’Connor v. Uber Techs., Inc.*, No. C-13-3826 EMC, 2015 WL 355496, at *3 (N.D. Cal. Jan. 27, 2015).
 23 On the other hand, the public disclosure of the PII contained within the Response could cause significant
 24 and avoidable harm or embarrassment to the affected individuals. Moreover, no less restrictive alternative

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 26 ¹ Uber proposes redacting all addresses, because Uber is not able to assess which addresses are
 27 potentially personally identifying.

1 to sealing the PII in the Response is sufficient. Local Rule 79-5(c)(1)(iii). Uber's request is narrowly
2 tailored to seal only the PII while ensuring that the public retains access to the rest of the Response. This
3 Court may therefore "appropriately balance[]” the privacy interests of the affected individuals with the
4 public's right to access by allowing redaction of all such PII in the Motion. *O'Connor*, 2015 WL 355496,
5 at *2.

6 **CONCLUSION**

7 For the foregoing reasons, Uber respectfully requests this Court grant the administrative motion to
8 seal the personal identifying information, specifically the names, addresses, contact information, and
9 financial information, contained in the Response.

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1 DATED: August 19, 2025

Respectfully submitted,

2 /s/ Laura Vartain Horn

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